

**EXHIBIT C**

**DECLARATION OF**

**MICHAEL J. HUI**

**From:** Michael J. Hui <mhui@gunder.com>  
**Sent:** Thursday, April 17, 2025 11:49 AM  
**To:** Terry Ahearn <tahearn@tesla.com>  
**Cc:** Joanne A. Ely <jely@gunder.com>; Lou Dorny <ldorny@tesla.com>; Terry Ahearn <tahearn@tesla.com>  
**Subject:** RE: Former Employment of Zhongjie "Jay" Li

Hi Terry, please let me know if you have time tomorrow after 1:30 PT to connect.

My best,

Michael

**Michael J. Hui** (he/him)

[mhui@gunder.com](mailto:mhui@gunder.com)  
Direct: [415 801 4876](tel:4158014876)  
Cell: [415 215 3820](tel:4152153820)  
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GUNDERSON DETTMER STOUGH VILLENEUVE FRANKLIN & HACHIGIAN, LLP

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**From:** Michael J. Hui <[mhui@gunder.com](mailto:mhui@gunder.com)>

**Sent:** Monday, April 14, 2025 5:23 PM

**To:** Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>

**Cc:** Joanne A. Ely <[jely@gunder.com](mailto:jely@gunder.com)>; Lou Dorny <[ldorny@tesla.com](mailto:ldorny@tesla.com)>; Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>

**Subject:** Re: Former Employment of Zhongjie "Jay" Li

Hi Terry, I will get back to you by middle/late this week.

My best,

Michael

**Michael J. Hui** (he/him)

[mhui@gunder.com](mailto:mhui@gunder.com)

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On Apr 14, 2025, at 12:05 PM, Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)> wrote:

Michael,

Wanted to follow-up on our Wednesday call last week. Please let us know how Mr. Li and Proception intend to proceed.

Thank you.

Terry

Terry Ahearn

Managing Counsel, IP Litigation

3000 Hanover St., Palo Alto, CA 94304  
E. [tahearn@tesla.com](mailto:tahearn@tesla.com) T. 408.204.7384  
[<image001.png>](#)

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**From:** Michael J. Hui <[mhui@gunder.com](mailto:mhui@gunder.com)>  
**Sent:** Monday, April 7, 2025 4:17 PM  
**To:** Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>; Joanne A. Ely <[jely@gunder.com](mailto:jely@gunder.com)>  
**Cc:** Lou Dorny <[ldorny@tesla.com](mailto:ldorny@tesla.com)>  
**Subject:** RE: Former Employment of Zhongjie "Jay" Li

Yes, that works, Terry. An invite would be much appreciated.

My best,

Michael

**Michael J. Hui** (he/him)

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**From:** Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>  
**Sent:** Monday, April 7, 2025 2:01 PM  
**To:** Michael J. Hui <[mhui@gunder.com](mailto:mhui@gunder.com)>; Joanne A. Ely <[jely@gunder.com](mailto:jely@gunder.com)>  
**Cc:** Lou Dorny <[ldorny@tesla.com](mailto:ldorny@tesla.com)>; Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>  
**Subject:** RE: Former Employment of Zhongjie "Jay" Li

Thank you, Michael. Let's do **3:00pm pacific on Wednesday, April 9**. If this works (it is within the time frame you proposed), I will send out a calendar invite for our discussion.

Terry Ahearn

Managing Counsel, IP Litigation  
3000 Hanover St., Palo Alto, CA 94304  
E. [tahearn@tesla.com](mailto:tahearn@tesla.com) T. 408.204.7384  
<[image001.png](#)>

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**From:** Michael J. Hui <[mhui@gunder.com](mailto:mhui@gunder.com)>  
**Sent:** Monday, April 7, 2025 10:51 AM  
**To:** Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>; Joanne A. Ely <[jely@gunder.com](mailto:jely@gunder.com)>  
**Cc:** Lou Dorny <[ldorny@tesla.com](mailto:ldorny@tesla.com)>  
**Subject:** RE: Former Employment of Zhongjie "Jay" Li

Hi Terry,

I have limited availability during the earlier part of this week. But I can speak on Wednesday afternoon between 1 PT to 4 PT.

My best,

Michael

**Michael J. Hui** (he/him)

—  
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**From:** Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>  
**Sent:** Friday, April 4, 2025 4:33 PM  
**To:** Joanne A. Ely <[jely@gunder.com](mailto:jely@gunder.com)>  
**Cc:** Michael J. Hui <[mhui@gunder.com](mailto:mhui@gunder.com)>; Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>; Lou Dorny <[ldorny@tesla.com](mailto:ldorny@tesla.com)>  
**Subject:** RE: Former Employment of Zhongjie "Jay" Li

Michael,

Thank you for reaching out. We will direct all further communications regarding this urgent matter to you. I assume you have seen our letter but I am attaching it here for your convenience. Can we set up a time to talk on Monday? Let me know your availability between 12:00 and 2:00 pacific or anytime after 4:00 pacific. In the meantime, as our letter requested, and as I reiterated to Mr. Li when I spoke with him last night, please confirm that Mr. Li and Proception have suspended all document deletion or destruction protocols, including all communications, and confirm all potentially relevant information is being preserved. We look forward to working with you towards resolution of this matter.

Terry

**Terry Ahearn**

Managing Counsel, IP Litigation

3000 Hanover St., Palo Alto, CA 94304

E. [tahearn@tesla.com](mailto:tahearn@tesla.com) T. 408.204.7384

[<image001.png>](#)

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**From:** Joanne A. Ely <[jely@gunder.com](mailto:jely@gunder.com)>

**Sent:** Friday, April 4, 2025 4:01 PM

**To:** Terry Ahearn <[tahearn@tesla.com](mailto:tahearn@tesla.com)>

**Cc:** Michael J. Hui <[mhui@gunder.com](mailto:mhui@gunder.com)>

**Subject:** Former Employment of Zhongjie "Jay" Li

Hi Mr. Ahearn,

Please find the attached correspondence from Michael Hui regarding the above-referenced matter.

Best,

Joanne

**Joanne A. Ely**

Legal Secretary

—  
[jely@gunder.com](mailto:jely@gunder.com)

Direct: [858 436 8036](tel:8584368036)

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